

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

WOODRUN PLACE UNIT OWNERS')	CASE NO.:
ASSOCIATION)	
)	JUDGE:
Plaintiff,)	
)	MAGISTRATE JUDGE:
vs.)	
)	
GREATER NEW YORK INSURANCE)	
COMPANIES)	
)	
Defendant.		

DEFENDANT'S NOTICE OF REMOVAL

Without consenting to service of process or to the jurisdiction of this tribunal, Defendant Greater New York Insurance Companies (“Defendant”) hereby removes this action from the Franklin County Common Pleas Court in Columbus, Ohio to the United States District Court for the Southern District of Ohio, Eastern Division. The grounds for this removal are as follows:

1. Plaintiff filed its Complaint on November 14, 2023, in the Franklin County Common Pleas Court in Columbus, Ohio captioned *Woodrun Place Unit Owners' Association v. Greater New York Insurance Companies*, Case No.: 2023-CV-008124.
2. Plaintiff's Complaint asserts, *inter alia*, a claim for breach of contract and declaratory judgment against Defendant.
3. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1332, 1441, and 1446 because this is a civil action in which the amount in controversy exceeds \$75,000.00, exclusive of costs and interests, and because there exists complete diversity between Plaintiff and Defendant. Plaintiff is formed and existing under the laws of Ohio with its principal place of

business in Ohio, and Defendant is formed and existing under the laws of New York with its principal place of business in New York, New York.

4. Removal to this Court is proper because this is the “district and division embracing the place where [the state court] action is pending.” 28 U.S.C. § 1441(a).

5. Attached hereto as Exhibit A is a copy of the Complaint.

6. Attached hereto as Exhibit B is a copy of the Docket in the state court action.

7. This removal is filed within thirty (30) days of service of the Complaint, which is the initial pleading setting forth the claims for relief upon which this action against the Defendant is based.

8. Promptly after the filing of this Notice of Removal, the Defendant will give written notice thereof to Plaintiff and will file a copy of this Notice with the Franklin County Common Pleas Court in Columbus, Ohio.

WHEREFORE, Defendant hereby give notice that the above-captioned action filed by Plaintiff is removed to this Court.

Respectfully submitted,

/s/ Matthew T. Anderson

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served via electronic mail only on this 7th day of December, 2023, upon the following:

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